

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
KASEY J. KIRK : CASE NO. 1-21-00418-HWV
Debtor :
: CHAPTER 13
MIDFIRST BANK :
Movant :
: v. :
: :
KASEY J. KIRK :
Respondent :
:

DEBTOR'S RESPONSE TO MOTION OF
MIDFIRST BANK FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Debtor, Kasey J. Kirk, by and through his attorney, Gary J. Imblum, and respectfully responds as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. The Mortgage and Assignment speak for themselves.
5. Admitted.
6. Admitted in part and denied in part. Debtor was granted a forbearance for April and May 2021. Accordingly, the only payment due and owing is that for June 2021. Debtor will make the June payment on June 25, 2021.
7. Admitted in part and denied in part. See response to paragraph 6.
8. Denied. Debtor is providing adequate protection through regular monthly payments.

To the extent that the monthly payments are in arrears, Debtor will make an offer in the near future to bring same current.

9. Admitted.

10. Denied. All fees and costs to which Movant believes it is entitled should be resolved through this Motion for Relief.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
Attorney I.D. No. 42606
4615 Derry Street
Harrisburg, PA 17111
(717) 238-5250
Fax No. (717) 558-8990
gary.imblum@imblumlaw.com
Attorney for Debtor

DATED: 6-22-21

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF MIDFIRST BANK FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

REBECCA A. SOLARZ, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

Carol V. Shay
Carol V. Shay, Paralegal
4615 Derry Street
Harrisburg, PA 17111
(717) 238-5250
Fax No. (717) 558-8990
gary.imblum@imblumlaw.com
For Debtor

DATED: 6/22/2021